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Superior Court Of California
County Of Los Angeles

JUN 19 2017

Sherri R. Carter, Executive Officer/Clerk
By: Charlie L. Coleman, Deputy

Attorneys for Plaintiff

NO FEE – GOV'T CODE § 6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

DIRAN SAHNAZOGLU, an individual; JANET
SAHNAZOGLU aka JANET BODURMAN, an
individual; MADLEN SAHNAZOGLU aka MADLEN
ALPAMUK aka MADLEN SOHNAZOGLU, an
individual; ARI GARBIS SAHNAZOGLU, an
individual; and DOES 1 through 100, inclusive,

Defendants.

Case No.: **BC 6 6 5 6 4 4**

**COMPLAINT FOR ABATEMENT,
INJUNCTION, AND CIVIL
PENALTIES**

[HEALTH & SAFETY CODE SECTION
11570, *ET SEQ.*; CIVIL CODE SECTION
3479, *ET SEQ.*]

[Unlimited Action]

PLAINTIFF, THE PEOPLE OF THE STATE OF CALIFORNIA, alleges as follows:

INTRODUCTION

1. This action is brought and prosecuted by the People of the State of California ("Plaintiff" or "People"), for the purpose of enjoining and abating a narcotics and gang-related general public nuisance that exists at the single-family residence located at 6610 Orion Avenue, Los Angeles, California 91304 ("Property"). Within the last year, the Los Angeles Police Department ("LAPD") has served two search warrants at the Property resulting in multiple arrests and the recovery of stolen and

1 unregistered firearms, live ammunition, narcotics, and evidence of identity theft. On June 4, 2017, a
2 drive-by shooting occurred at the Property targeting Defendant ARI GARBIS SAHNAZOGLU, a
3 documented member of the Armenian Power criminal street gang who lives at the Property, while he
4 was on the front porch of the Property.¹ LAPD officers have also arrested several individuals traveling
5 through the surrounding neighborhood to and from the Property for narcotics, firearm, and stolen vehicle
6 violations resulting in the recovery of guns, ammunition, a bullet proof vest, heroin, methamphetamine,
7 and burglary tools. LAPD officers have also observed activity consistent with narcotics sales at the
8 Property, including individuals arriving at the location, entering the Property, and coming back out and
9 leaving within a short time. Over approximately the last two years, the Property has been the subject of
10 74 radio calls for service to the LAPD.

11 2. Defendant ARI GARBIS SAHNAZOGLU resides at the Property. The Property is
12 owned by Defendants DIRAN SAHNAZOGLU, JANET SAHNAZOGLU aka JANET BODURMAN
13 ("JANET SAHNAZOGLU"), and MADLEN SAHNAZOGLU aka MADLEN ALPAMUK aka
14 MADLEN SOHNAZOGLU ("MADLEN SAHNAZOGLU"), Defendant ARI GARBIS
15 SAHNAZOGLU's parents and aunt, respectively, who allow him to live at the Property. Defendants
16 DIRAN SAHNAZOGLU, JANET SAHNAZOGLU, and MADLEN SAHNAZOGLU have been
17 apprised by the Los Angeles Police Department of the nuisance activity occurring at their Property, yet
18 refuse to take necessary action, allowing the nuisance activity at the Property to continue and proliferate.

19 3. The People assert their power pursuant to California Health and Safety Code section
20 11570, et seq. (the "Narcotics Abatement Law") and Civil Code section 3479, et seq. (the "Public
21 Nuisance Law") to remedy these injuries to the public interest. The People seek to enjoin Defendants'
22 future violations of law and to assess civil penalties and costs including, and not limited to, law
23 enforcement investigative costs, attorney's fees, and court costs against all Defendants for violations of
24 law under these provisions.

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¹ It is common for gang rivals to target each other in drive-by shootings.

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GENERAL ALLEGATIONS

The Parties

4. Plaintiff, The People of the State of California, acting through the Los Angeles City Attorney, Michael N. Feuer, brings this action pursuant to the authority granted by Health and Safety Code section 11571 and Code of Civil Procedure section 731.

5. Defendants DIRAN SAHNAZOGLU, JANET SAHNAZOGLU, and MADLEN SAHNAZOGLU were and are the owners of the Property and at all times mentioned herein have acted in such a capacity. According to public records, DIRAN SAHNAZOGLU and JANET SAHNAZOGLU hold title to the Property as husband and wife in a joint tenant capacity, and MADLEN SAHNAZOGLU holds title to the Property as a married woman, sole and separate.

6. Defendant ARI GARBIS SAHNAZOGLU, 27, resides at the Property. Defendant ARI GARBIS SAHNAZOGLU has prior convictions for firearm and weapons violations and multiple property crime related convictions, including for Grand Theft. During the time ARI GARBIS SAHNAZOGLU has resided at the Property, LAPD officers have recovered narcotics and unregistered and stolen firearms both at the Property and from individuals traveling to and from the Property. Additionally, a recent drive-by shooting targeted ARI GARBIS SAHNAZOGLU while he was standing on the front porch of the Property. Defendant ARI GARBIS SAHNAZOGLU also regularly rides his motorcycle erratically and at dangerously high speeds throughout the neighborhood.

7. The true names and capacities of Defendants sued herein as DOES 1 through 100, inclusive, are unknown to Plaintiff, who therefore sues these Defendants by such fictitious names pursuant to Section 474 of the California Code of Civil Procedure. Each such Defendant is responsible in some manner for conducting, maintaining, or directly or indirectly permitting the unlawful activity complained of herein. When the true names and capacities of said Defendants have been ascertained, Plaintiff will ask leave of the court to amend this complaint and to insert in lieu of such fictitious names the true names and capacities of any fictitiously named Defendants.

The Property

8. The Property is a single-family residence, located at the commonly known address of 6610 Orion Avenue, Los Angeles, California 91406. The Property has a detached garage on the

southeast side of the Property. The Property is located on the east side of Orion Avenue between Lemay Street and Haynes Street in the Van Nuys area of Los Angeles. The Property is more specifically described as: "Lot 32 of Tract No. 11449 in the City of Los Angeles, County Los Angeles, State of California, as per map recorded in Book 255, pages 14 and 15 of maps, in the Office of the County Recorder of Said County." Assessor's Parcel No: 2234-019-018.

Jurisdiction and Venue

9. Each of the acts alleged herein were performed by Defendants, in whole or in part, in the City of Los Angeles.

10. The Property that is the subject of this action is located in the City of Los Angeles.

Narcotics and General Nuisance Activity

11. Specific examples of the criminal nuisance activity occurring at or related to the Property include, but are not limited to, the following:

- On July 13, 2016, during service of a search warrant for narcotics at the Property, LAPD officers recovered methamphetamine and three firearms. Two of the firearms were unregistered and one was stolen. Defendant ARI GARBIS SAHNAZOGLU was arrested and charged with a violation of Penal Code section 29800, unlawful possession of a firearm, a felony.²

- On December 15, 2016, LAPD officers received a radio call of a disturbance at the Property, specifically that Defendant ARI GARBIS SAHNAZOGLU was racing his motorcycle up and down the street. Upon arriving at the Property, officers observed a motorcycle and saw Defendant ARI GARBIS SAHNAZOGLU run into the residence at the Property. Officers also observed a vehicle approach the Property with no license plates. Officers stopped the vehicle and learned it was stolen. During the subsequent arrest, officers recovered narcotics and evidence of identity theft.

- On May 18, 2017, LAPD officers stopped a stolen vehicle in the front of the Property. The vehicle had three occupants. The driver of the vehicle told officers they were at the Property because they were contracted by Defendant ARI GARBIS SAHNAZOGLU to "build a block wall." The driver of the vehicle was a convicted felon. The occupant in the back seat of the vehicle was on probation and provided false identification information to the officers. During the subsequent

² As of the filing of this Complaint, criminal case #LA083985 is pending against Defendant ARI GARBIS SAHNAZOGLU.

1 investigation and arrest, LAPD officers recovered methamphetamine, a bullet proof vest, a loaded 9 mm
2 semi-automatic firearm, 9 rounds of live ammunition, a 9 mm stainless steel extended round magazine,
3 and a 10-inch blade hunting knife.

4 • On June 4, 2017, at approximately 7:40 a.m., LAPD officers received a radio call of shots
5 fired at the Property. During the subsequent investigation, officers learned that a vehicle with tinted
6 windows drove past the Property and an unknown suspect fired a gun at Defendant ARI GARBIS
7 SAHNAZOGLU who was on the front porch of the Property. A witness who was at the Property at the
8 time of the shooting gave officers a spent bullet fragment that he had picked up from the ground at the
9 base of the front porch on the Property. (The witness was also an occupant of the stolen vehicle stopped
10 at the Property on May 18, 2017.)

11 • On June 7, 2017, LAPD officers received a radio call of a burglary from a motor vehicle
12 at the Property. During the subsequent investigation, LAPD officers arrested two individuals and
13 recovered burglary tools, heroin, and methamphetamine belonging to an individual staying at the
14 Property.

15 • On June 10, 2017, during service of a search warrant at the Property, LAPD officers
16 arrested four individuals, including Sahak Himayak Sahnazoglu, Defendants' relative and a resident of
17 the Property, and recovered methamphetamine, ammunition, stolen mail, and a U.S. Postal arrow key.
18 An "arrow key" is used to enter secured facilities by U.S. Postal Service employees to access resident
19 mailboxes. It is commonly used and possessed by burglars and thieves. The arrow key was recovered
20 in a toilet at the Property indicating an attempt to dispose of the evidence.

21 **FIRST CAUSE OF ACTION FOR NARCOTICS ABATEMENT**

22 **[Health and Safety Code Section 11570, et seq. –**

23 **Against Defendants and DOES 1 through 100]**

24
25 12. Plaintiff hereby incorporates paragraphs 1 through 11, above, as if fully realleged herein.

26 13. The abatement of a nuisance is a long established and well-recognized exercise of the
27 state's police power. (*People v. Barbieri* (1917) 33 Cal.App. 770, 775; *People ex rel. Hicks v. Sarong*
28 *Gals* (1974) 42 Cal.App.3d 556, 563.) Since its enactment in 1972, the principal purpose of the

1 Narcotics Abatement Law (Health & Saf. Code, § 11570, et seq.) is the abatement of buildings and
2 places “used for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, or giving
3 away any controlled substance, precursor, or analog specified in this division, and every building
4 wherein or upon which those acts take place . . .” (Health and Saf. Code, § 11570).

5 14. The Narcotics Abatement Law provides that “[e]very building or place used for the
6 purpose of unlawfully selling, serving, storing, keeping, manufacturing, or giving away any controlled
7 substance, precursor, or analog specified in this division, and every building or place wherein or upon
8 which those acts take place, is a nuisance which **shall** be enjoined, abated, and prevented . . . whether
9 it is a public or private nuisance.” (Health & Saf. Code, § 11570 [emphasis added]; *People ex rel.*
10 *Lungren v. Peron* (1997) 59 Cal.App.4th 1383, 1389; *Lew v. Superior Court* (1993) 20 Cal.App.4th 866,
11 870-71.)

12 15. Health and Safety Code section 11571 authorizes a city attorney to bring an action to
13 abate, prevent and perpetually enjoin such nuisances. It provides in relevant part: “Whenever there is
14 reason to believe that a nuisance as described in Section 11570 is kept, maintained, or exists in any
15 county, the district attorney of the county, or the city attorney of any incorporated city or of any city and
16 county, in the name of the people, may . . . maintain an action to abate and prevent the nuisance and
17 perpetually to enjoin the person conducting or maintaining it, and the owner, lessee, or agent of the
18 building or place in or upon which the nuisance exists from directly or indirectly maintaining or
19 permitting the nuisance.”

20 16. Health and Safety Code section 11573(a) provides that: “If the existence of the nuisance
21 is shown in the action to the satisfaction of the court or judge, either by verified complaint or affidavit,
22 the court or judge **shall** allow a temporary restraining order or injunction to abate and prevent the
23 continuance or recurrence of the nuisance.” (Emphasis added.) In addition, Health and Safety Code
24 section 11581 provides, as an additional remedy, for the removal and sale of all fixtures and movable
25 property on the premises used in aiding or abetting the nuisance and for the closure of the building for
26 up to one year.

27 17. Plaintiff is informed and believes and thereon alleges that Defendants, and DOES 1
28 through 100, are responsible for conducting, maintaining, and/or directly or indirectly permitting the

1 nuisance that currently exists at the Property. The Property, including every building or place wherein
2 or upon the Property which those acts take place, was used, and is being used, from an exact date
3 unknown but at least since June 2016, for the purposes of unlawfully selling, serving, storing, keeping,
4 manufacturing or giving away controlled substances in violation of Health and Safety Code section
5 11570, et seq.

6 18. Between June 2016 and the present, law enforcement officers have made several arrests
7 for narcotics or narcotics-related offenses at, or directly related to, the Property. As a result of the
8 arrests, officers recovered, among other items, methamphetamine, heroin, marijuana, baggies, glass
9 pipes, and syringes.

10 19. The general reputation of the Property in the community and among law enforcement is
11 that it is a location where the selling, serving, storing, keeping, and/or giving away of narcotics has
12 taken place on an ongoing and continuous basis since at least June 2016.

13 20. Defendants are the owners, operators, lessors, or lessees of the fixtures and moveable
14 property contained within the Property, and said fixtures and moveable property were used and are
15 presently being used by the Defendants in conducting, maintaining, and/or permitting the use of the
16 Property, including its grounds, buildings, and premises, for narcotics activity.

17 21. Plaintiff has no plain, speedy, and adequate remedy at law, and unless Defendants, and
18 DOES 1 through 100, are restrained and enjoined by order of this Court, they will continue to use,
19 occupy, maintain, and/or permit, directly or indirectly, the use, occupation and maintenance of the
20 Property, together with the fixtures and appurtenances located therein, for the nuisance complained of
21 herein, to the great and irreparable damage of the public and in violation of California law.

22 **SECOND CAUSE OF ACTION FOR PUBLIC NUISANCE**

23 **[Civil Code Section 3479, et seq. –**

24 **Against Defendants and DOES 1 through 100]**

25 22. Plaintiff hereby incorporates paragraphs 1 through 21, above, as if fully realleged herein.

26 23. Civil Code section 3479 defines a public nuisance as “[a]nything which is injurious to
27 health, including, but not limited to, the illegal sale of controlled substances, or is indecent or offensive
28 to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable

1 enjoyment of life or property” (See *City of Bakersfield v. Miller* (1966) 64 Cal.2d 93, 99 [“The
2 Legislature has defined in general terms the word ‘nuisance’ in Civil Code section 3479”].)

3 24. Civil Code section 3480 defines a public nuisance as “one which affects at the same time
4 an entire community or neighborhood, or any considerable number of persons, although the extent of the
5 annoyance or damage inflicted upon individuals may be unequal.”

6 25. Civil Code section 3491 provides that the “remedies against a public nuisance are
7 indictment or information, a civil action or abatement.” Abatement is “accomplished by a court of
8 equity by means of an injunction proper and suitable to the facts of each case.” (*Sullivan v. Royer*
9 (1887) 72 Cal. 248, 249.)

10 26. Code of Civil Procedure section 731 authorizes a city attorney to bring an action to enjoin
11 or abate a public nuisance. It provides in relevant part “[a] civil action may be brought in the name of
12 the people of the State of California to abate a public nuisance . . . by the city attorney of any town or
13 city in which such nuisance exists.”

14 27. Where “a building or other property is so used as to make it a nuisance under the statute,
15 the nuisance may be abated . . . , notwithstanding that the owner had no knowledge that it was used for
16 the unlawful purpose constituting a nuisance.” (*People ex rel. Bradford v. Barbieri* (1917) 33 Cal.App.
17 770, 779; see also *Sturges v. Charles L. Harney, Inc.* (1958) 165 Cal.App.2d 306, 318 (“a nuisance and
18 liability therefore may exist without negligence”); *People v. McCadden* (1920) 48 Cal.App. 790, 792
19 (“A judgment supported on findings that such nuisance was conducted and maintained on the premises
20 in question, regardless of the knowledge of the owner thereof, is sufficient. Such knowledge on the part
21 of the owner . . . is unnecessary.”); *People v. Peterson* (1920) 45 Cal.App. 457, 460 (“[I]t was not
22 necessary . . . for the trial court to find either, that the [defendants] threatened, and unless restrained,
23 would continue to maintain, aid, and abet, the nuisance, or that they knew the building was used in
24 violation of the act. . . . The existence of the nuisance was the ultimate fact in this case, and having been
25 found, supports the judgment.”).) This is because “the object of the act is not to punish; its purpose is to
26 effect a reformation of the property itself.” (*People v. Bayside Land Co.* (1920) 48 Cal.App. 257, 261.)

27 28. From an exact date unknown, but since at least June 2016 through the present time,
28 Defendants and DOES 1 through 100, have owned, operated, occupied, used, and/or directly or

1 indirectly permitted to be occupied and used, the Property in such a manner as to constitute a public
2 nuisance in violation of Civil Code sections 3479 and 3480. The public nuisance, as described herein, is
3 injurious to health, indecent or offensive to the senses, and/or an obstruction to the free use of property,
4 so as to substantially and unreasonably interfere with the comfortable enjoyment of life or property by
5 those persons living in the community surrounding the Property. The public nuisance consists of, but is
6 not limited to, the illegal sale, use, keeping, storage, and/or giving away of controlled substances that
7 occurs at or related to the Property; the threatening and disorderly presence of gang members and/or
8 their associates at the Property; the presence of illegal firearms and ammunition at or related to the
9 Property; the erratic and high speed driving of vehicles through the surrounding neighborhood by
10 residents and visitors to the Property; and the recovery of stolen vehicles at or related to the Property.

11 29. Defendants, and DOES 1 through 100, in owning, conducting, maintaining, and/or
12 permitting the use of the Property, directly or indirectly, as a public nuisance, have engaged in wrongful
13 conduct and caused a serious threat to the general health, safety, and welfare of the persons in the area
14 surrounding the Property.

15 30. Plaintiff has no adequate remedy of at law in that damages are insufficient to protect the
16 public from the present danger and harm caused by the conditions described herein. Unless Defendants,
17 and DOES 1 through 100, are restrained and enjoined by order of this Court, they will continue to use,
18 occupy and maintain, and to aid, abet or permit, directly or indirectly, the use, occupation, and
19 maintenance of the Property, together with the fixtures and appurtenances located therein, for the
20 purpose complained of herein, to the great and irreparable damage of Plaintiff and in violation of
21 California law.

22 PRAYER

23 WHEREFORE, PLAINTIFF PRAYS THAT THIS COURT ORDER, ADJUDGE AND
24 DECREE AS FOLLOWS:

25 AS TO THE FIRST CAUSE OF ACTION

26 31. That Defendants, and DOES 1 through 100, and the Property, including all buildings and
27 structures thereon, be declared in violation of Health and Safety Code section 11570, et seq.

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1 32. That the Property, together with the fixtures and moveable property therein and thereon,
2 constitutes a public nuisance and be permanently abated as such in accordance with Section 11581 of the
3 California Health and Safety Code.

4 33. That the Court grant a temporary restraining order, preliminary injunction, permanent
5 injunction and order of abatement in accordance with Section 11570, et seq. of the Health and Safety
6 Code, enjoining and restraining all Defendants, and their agents, servants, employees, partners,
7 principals, assigns, and all those acting in concert with, aiding and abetting, and/or participating with
8 them from unlawfully selling, serving, storing, keeping, manufacturing, or giving away controlled
9 substances on the Property.

10 34. That as part of the Judgment, an Order of Abatement be issued, and that the Property be
11 closed for a period of one year, not to be used for any purpose, and be under the control and custody of
12 the Court for said period of time, or, in the alternative, if deemed harmful to the community, that
13 Defendants, and DOES 1 through 100, pay damages in an amount equal to the fair market rental value of
14 the Property for one year to the City of Los Angeles in accordance with Health and Safety Code section
15 11581 subdivision (c)(1).

16 35. That pursuant to Health and Safety Code section 11581 all fixtures and moveable
17 property used in conducting, maintaining, aiding or abetting the nuisance at the Property be removed by
18 the Los Angeles Police Department ("LAPD") or the appropriate agency and sold in the manner
19 provided for the sale of chattels under execution. Said fixtures and property shall be inventoried and a
20 list prepared and filed with this court.

21 36. That there shall be excepted from said sale, such property to which title is established in
22 some third party not a defendant, nor agent, officer, employee or servant of any defendant in this
23 proceeding.

24 37. That the proceeds from said sale be deposited with this court for payment of the fees and
25 costs of sale. Such costs may occur in closing said Property and keeping them closed, removal of said
26 property, and Plaintiff's costs in the action, including attorneys' fees, and such other costs as the court
27 shall deem proper.
28

1 38. That if the proceeds of the sale do not fully discharge all such costs, fees and allowances,
2 the Property shall also be sold under execution issued upon the order of the court or judge and the
3 proceeds of such sale shall be applied in a like manner.

4 39. That any excess monies remaining after payment of approved costs shall be delivered to
5 the owner of said Property. Ownership shall be established to the satisfaction of this court.

6 40. That the Court issue orders that ARI GARBIS SAHNAZOGLU, Sahak Himayak
7 Sahnazoglu, and any DOE Defendants contributing to the nuisance activity and currently residing at the
8 Property move out and stay at least 1,000 feet away from the Property.

9 41. That the Court order physical and managerial improvements to the Property in
10 accordance with Health and Safety Code section 11573.5, and such orders as are otherwise appropriate
11 to remedy the nuisance on the Property and enhance the abatement process, including but not limited to
12 the appointment of a receiver.

13 42. That pursuant to Health and Safety Code section 11581, Defendants and DOES 1-100
14 each be assessed a civil penalty in an amount not to exceed \$25,000.00.

15 43. That Plaintiff recover the costs of this action, including law enforcement investigative
16 costs and any fees, including attorneys' fees, authorized by Civil Code section 3496(c) from all
17 Defendants in an amount not to exceed \$750,000.00.

18 44. That Plaintiff recover the amount of the filing fees and the amount of the fee for the
19 service of process or notices which would have been paid but for Government Code section 6103.5,
20 designating it as such in an amount not to exceed \$10,000.00. The fees may, at the Court's discretion,
21 include the amount of the fees for certifying and preparing transcripts.

22 45. That Plaintiff be granted such other and further relief as the Court deems just and proper.

23 AS TO THE SECOND CAUSE OF ACTION

24 46. That the Property, together with the fixtures and moveable property therein and thereon,
25 be declared a public nuisance and be permanently abated as such in accordance with Civil Code section
26 3491.

27 47. That Defendants, and their agents, employees and anyone acting on their behalf, and their
28 heirs and assignees, be perpetually enjoined from operating, conducting, using, occupying, or in any

1 way permitting the use of the Property as a public nuisance. Such orders should include, but not be
2 limited to: (1) physical and managerial improvements to the Property, (2) that Defendant ARI GARBIS
3 SAHNAZOGLU and his uncle, Sahak Himayak Sahnazoglu, move out of and stay 1,000 feet away from
4 the Property, and (3) such other orders as are appropriate to remedy the nuisance on the Property and
5 enhance the abatement process.

6 48. That Plaintiff recovers the costs as may occur in abating said nuisance at the Property,
7 including and not limited to, the amount of the filing fees and the amount of the fees for the service of
8 process or notices which would have been paid but for Government Code section 6103.5, designating it
9 as such not to exceed \$500,000.00. The fees may, at the Court's discretion, include the amount of the
10 fees for certifying and preparing transcripts.

11 49. That Plaintiff be granted such other and further relief as the Court deems just and proper,
12 including closure and/or demolition of the Property.

13 AS TO ALL CAUSES OF ACTION

14 50. That Plaintiff be granted such other and further relief as the Court deems just and proper.
15

16 DATED: June 19, 2017

Respectfully submitted,

17 MICHAEL N. FEUER, City Attorney

18 JONATHAN CRISTALL, Managing Assistant City Attorney

19 LIORA FORMAN-ECHOLS, Asst. Superv. Deputy City Attorney

20 By: 

21 RYAN BORHO, Deputy City Attorney

22 Attorneys for Plaintiff, THE PEOPLE OF THE STATE
23 OF CALIFORNIA
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